Compliance Management System:

The Legal and Other Requirements element of the EMS requires each pilot to identify the legal requirements for its operations and facilities, including relevant environmental laws, regulations and permits, and worker health and safety regulations, and have a process for tracking any changes in these requirements. Due to the similarities in this requirement, this element was identified as a potential area for collaboration by the initial six pilots and for future EMS applicants. To fulfill this task, the six pilots support the creation and utilization of a Compliance Management System (CMS), an essential tool in maintaining compliance with the numerous legal and environmental regulations solid waste management facilities are required to follow.

This would be accomplished through a CMS software program. The tasks required to comply with Federal, State, & Local Rules would be identified for each pilot area through review of pertinent rules and permits including:

> SDP Permits
> Iowa Administrative Code 567 Chapters 22 - 25, 61, 100 – 123
> County Air Regulations
> Title V Permits
> NPDES Permits
> Title 40 CFR Part 60 Subpart WWW-Standards of Performance for MSW Landfills
> Title 40 CFR Part 61 National Emission Standards for Haz Air Pollutants Subpart M
> National Emission Standard for Asbestos
> Title 40 CFR Part 61.154 Standard for Active Waste Disposal Sites
> Title 40 CFR Part 63 Subpart AAAA
> Title 40 CFR Part 258 Criteria for Municipal Sanitary Landfills
> OSHA requirements

The identified requirements would be confirmed with each pilot and populated into the CMS program. Once the initial input is completed, thorough training will be completed to ensure future information may be input by each pilot. The CMS allows for instantaneous information on due dates, revision dates for future audits/permits, the responsible party for tasks, overdue tasks, upcoming tasks, and budgets. It allows email reminders to be sent to both internal and external responsible parties, ongoing notifications when tasks have not been established as complete, and various reporting options. It allows permits and other documents to be attached to appropriate tasks in a PDF format. On-going use of this system allows confidence in the compliance of facilities for not only the repetitive tasks, but those that occur on a multi-year basis or that arise in response to environmental sampling results. Benchmarking of compliance is available through reports that have been developed, including a "scorecard". The CMS also allows for succession planning and continuity if a staff member is suddenly unavailable due to termination, illness, or other unforeseen circumstances.

The CMS Package includes web based reporting, software updates, hosting on a secure server backed up off site nightly, personalization with pilot logos, training on system use, user support, and standard operating procedures (SOPs).

All six pilot EMS agencies support the use of EMS designated funding. The cost of the system is estimated to be less than $15,000 per pilot. The CMS will not only allow the pilots to meet the legal and other requirements element, but could also be a great stepping stone for other agencies throughout the state moving toward an EMS in the future.